

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**In re:**

**WATSON GRINDING &  
MANUFACTURING CO.,**

**Debtor.**

## Chapter 11

**Case No. 20-30967**

**In re:**

**WATSON VALVE SERVICES, INC.,**

**Debtor.**

## Chapter 11

**Case No. 20-30968**

**JOINT EMERGENCY MOTION TO APPOINT THE HONORABLE DAVID R. JONES  
AS MEDIATOR**

**THIS MOTION SEEKS ENTRY OF AN ORDER THAT MAY ADVERSELY AFFECT YOU. IF YOU OPPOSE THE MOTION, YOU SHOULD IMMEDIATELY CONTACT THE MOVING PARTY TO RESOLVE THE DISPUTE. IF YOU AND THE MOVING PARTY CANNOT AGREE, YOU MUST FILE A RESPONSE AND SEND A COPY TO THE MOVING PARTY. YOU MUST FILE AND SERVE YOUR RESPONSE WITHIN 21 DAYS OF THE DATE THIS WAS SERVED ON YOU. YOUR RESPONSE MUST STATE WHY THE MOTION SHOULD NOT BE GRANTED. IF YOU DO NOT FILE A TIMELY RESPONSE, THE RELIEF MAY BE GRANTED WITHOUT FURTHER NOTICE TO YOU. IF YOU OPPOSE THE MOTION AND HAVE NOT REACHED AN AGREEMENT, YOU MUST ATTEND THE HEARING. UNLESS THE PARTIES AGREE OTHERWISE, THE COURT MAY CONSIDER EVIDENCE AT THE HEARING AND MAY DECIDE THE MOTION AT THE HEARING.**

**EMERGENCY RELIEF HAS BEEN REQUESTED. IF THE COURT CONSIDERS THE MOTION ON AN EMERGENCY BASIS, THEN YOU WILL HAVE LESS THAN 21 DAYS TO ANSWER. IF YOU OBJECT TO THE REQUESTED RELIEF OR IF YOU BELIEVE THAT THE EMERGENCY CONSIDERATION IS NOT WARRANTED, YOU SHOULD FILE AN IMMEDIATE RESPONSE.**

**REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEY.**

**To the Honorable Marvin Isgur,  
United States Bankruptcy Judge:**

The Official Committee of January 24 Claimants (the “Committee”), Janet Northrup, in her capacity as the chapter 11 trustee of Watson Grinding & Manufacturing Co. (the “Grinding Trustee”), Robert Ogle, in his capacity as the chapter 11 trustee of Watson Valve Services, Inc. (the “Valve Trustee”), John M. Watson, Western International Gas & Cylinders, Inc. (“Western”), and Matheson Tri-Gas, Inc. (“Matheson”) (collectively, the “Parties”) file this Joint Emergency Motion to Appoint the Honorable David R. Jones as Mediator.

**Basis for Emergency Consideration**

1. Judge Jones has agreed to conduct a mediation with the Parties on November 10, 2020, subject to entry of an order by this court appointing him as mediator. The Parties request emergency consideration because the mediation is scheduled for less than 21 days from the filing of this Motion.

**Background**

2. On October 22, 2020, the Court began a hearing regarding all motions to remand and motions to abstain that were filed pursuant to this Court’s *Order (I) Modifying Automatic Stay, (II) Setting the Deadline for Filing Notices of Removal, (III) Setting the Deadline for Filing Motions to Remand, and (IV) Scheduling Omnibus Hearing on Motion to Remand* (Doc. No. 279).

3. Rather than proceed with the evidentiary hearing on the Motions to Remand, the Parties agreed to participate in a mediation regarding a global resolution of all issues raised in the Motions to Remand, including a plan or plans of liquidation for the Debtors.

4. The Parties have agreed to participate in a mediation before the Honorable David R. Jones on November 10, 2020.

5. The Court will hold a status conference on the Motions to Remand on November 12, 2020 at 8:00 a.m.

**Relief Requested**

6. The Parties request that the Court enter the attached proposed order appointing Judge Jones as mediator in these cases, and grant the parties any other relief to which they may be entitled.

**Dated: October 26, 2020.**

/s/ Joshua W. Wolfshohl

Joshua W. Wolfshohl  
State Bar No. 24038592  
Aaron J. Power  
State Bar No. 24058058  
PORTER HEDGES LLP  
1000 Main Street, 36th Floor  
Houston, Texas 77002  
jwolfshohl@porterhedges.com  
apower@porterhedges.com

COUNSEL FOR THE OFFICIAL COMMITTEE  
OF JANUARY 24 CLAIMANTS

/s/ Matthew S. Okin

Matthew S. Okin  
State Bar No. 00784695  
James W. Bartlett, Jr.  
State Bar No. 0079238  
OKIN ADAMS LLP  
1113 Vine St., Suite 240  
Houston, Texas 77002  
mokin@okinadams.com  
jbartlett@okinadams.com

COUNSEL FOR ROBERT OGLE, CHAPTER 11  
TRUSTEE OF WATSON VALVE SERVICES, INC.

/s/ Wayne Kitchens

---

Wayne Kitchens  
State Bar No. 11541110  
Heather McIntyre  
State Bar No. 24041076  
HUGHES WATTERS ASKANASE LLP  
Total Plaza  
1201 Louisiana, 28<sup>th</sup> Floor  
Houston, Texas 77002  
wkitchens@hwa.com  
hmcintyre@hwa.com

COUNSEL FOR JANET S. NORTHRUP, CHAPTER 11  
TRUSTEE FOR WATSON GRINDING &  
MANUFACTURING CO.

/s/ Erin E. Jones

---

Erin E. Jones  
Texas Bar No. 24032478  
Ruth Van Meter  
Texas Bar No. 20661570  
JONES MURRAY & BEATTY, LLP  
4119 Montrose Blvd, Suite 230  
Houston, Texas 77006  
erin@jmbllp.com  
ruth@jmbllp.com

SPECIAL COUNSEL FOR JANET S. NORTHRUP,  
CHAPTER 11 TRUSTEE OF THE ESTATE OF WATSON  
GRINDING & MANUFACTURING CO.

/s/ Karl D. Burrer

---

Karl D. Burrer  
State Bar No. 24043584  
Mary-Olga Lovett  
State Bar No. 00789289  
GREENBURG TRAUIG LLP  
1000 Louisiana St., Suite 1700  
Houston, Texas 77002  
BurrerK@gtlaw.com  
LovettM@gtlaw.com

COUNSEL FOR MATHESON TRI-GAS, INC. AND  
WESTERN INTERNATIONAL GAS & CYLINDERS,  
INC.

/s/ Charles M. Rubio

Lenard M. Parkins PLLC  
State Bar No. 15518200  
Charles M. Rubio P.C.  
State Bar No. 24083768  
PARKINS LEE & RUBIO LLP  
700 Milam Street, Suite 1300  
Houston, Texas 77002  
lparkins@parkinslee.com  
crubio@parkinslee.com

COUNSEL FOR JOHN M. WATSON

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing instrument was duly served by electronic transmission to all registered ECF users appearing in the case on October 26, 2020

/s/ Joshua W. Wolfshohl

Joshua W. Wolfshohl